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October 22, 2025

**VIA ECF**

Hon. Peggy Kuo, U.S.M.J.  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re. Initial Conference**  
Fine et al v. AdVentures, Inc. et al  
1:25-cv-03848-PK

Dear Judge Kuo,

We represent Ian Fine, Joshua Rowe and Paul Magyar (“Plaintiffs”) in the above-referenced matter. I write to respectfully request an adjournment of the Initial Conference scheduled for tomorrow, October 23, 2025 at 10:30 a.m.

The Defendants were served with the Summons and Complaint on September 17, 2025, making their responsive pleading due on or before October 8, 2025. However, no attorney has appeared on their behalf, and I have not been contacted by any representative of the Defendants despite efforts to identify counsel. As a result, the parties were unable to confer or submit a joint Proposed Discovery Plan by the October 17 deadline.

I candidly acknowledge that I should have notified the Court sooner once it became apparent that Defendants would ignore their obligations. I expected to hear from an attorney by now and only realized recently that no appearance had been made. I apologize to the Court for not making this request earlier and for the inconvenience caused.

Accordingly, Plaintiffs respectfully request that the Initial Conference be adjourned to a later date (in the short term) to allow time for Defendants to appear and for the parties to comply with the Court’s pre-conference requirements. Alternatively, and with the Court’s permission, Plaintiffs can move for a default judgment.

Respectfully Submitted,

/s/ Thomas Andrykovitz  
Thomas H. Andrykovitz  
For the Firm